

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ROBERT P. GOODRICH,)
Petitioner,)
v.) Civil Action No. 03-12541-NG
TIM HALL,)
Respondent.)

)

**ASSENTED-TO MOTION FOR LEAVE TO IMPOUND PETITIONER'S
OPPOSITION TO RESPONDENT'S MOTION TO DISMISS
PETITION FOR WRIT OF HABEAS CORPUS**

Petitioner, Robert P. Goodrich, through counsel, hereby respectfully moves, pursuant to Local Rule 7.2, that the Court impound his Opposition to Respondent's Motion to Dismiss Petition For Writ of Habeas Corpus. In support of his motion, Petitioner states as follows:

1. On April 6, 2004, this Court granted Respondent's Assented-To Motion to Impound Supplemental Answer.
2. Respondent's Assented-To Motion to Impound Supplemental Answer was based on the fact that Petitioner's brief and appendix filed in the Massachusetts Appeals Court, in connection with Commonwealth v. Robert P. Goodrich, Middlesex County Superior Court Criminal Action No. 2000-00018, included impounded grand jury testimony.
3. Petitioner's Opposition to Respondent's Motion to Dismiss in this action references the above-referenced impounded grand jury testimony.
4. Respondent's counsel assents to the filing of this motion.

5. Pursuant to Local Rule 7.2(a), Petitioner represents that the impoundment order may be lifted upon the Court's disposition of the subject habeas petition, and all impounded materials may be returned to the Petitioner.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests that this Court impound Petitioner's Opposition to Respondent's Motion to Dismiss Petition for Writ of Habeas Corpus, which will be filed upon receipt of this Court's Order.

Respectfully submitted,

ROBERT P. GOODRICH,
By his attorneys,

/s/ Jill L. Brenner
Peter E. Gelhaar (BBO# 188310)
Jill L. Brenner (BBO# 652501)
Donnelly, Conroy & Gelhaar, LLP
One Beacon Street, 33rd Floor
Boston, MA 02108
(617) 720-2880

Dated: April 29, 2004

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that on April 29, 2004, I did confer in good faith, via telephone, with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion, and counsel for Respondent has indicated that she assents to this motion.

/s/
Jill L. Brenner